Section 1. Registration Information

Source Identification

Facility Name:	BCP Ingredients Incorporated
Parent Company #1 Name:	
Parent Company #2 Name:	

Submission and Acceptance

Submission Type:	Re-submission
Subsequent RMP Submission Reason:	5-year update (40 CFR 68.190(b)(1))
Description:	
Receipt Date:	25-Feb-2021
Postmark Date:	25-Feb-2021
Next Due Date:	25-Feb-2026
Completeness Check Date:	25-Feb-2021
Complete RMP:	Yes
De-Registration / Closed Reason:	
De-Registration / Closed Reason Other Text:	
De-Registered / Closed Date:	
De-Registered / Closed Effective Date:	
Certification Received:	Yes

Facility Identification

EPA Facility Identifier:	1000 0007 1281
Other EPA Systems Facility ID:	67569SYNTXFIRST
Facility Registry System ID:	

Dun and Bradstreet Numbers (DUNS)

Facility DUNS:	41992728
Parent Company #1 DUNS:	
Parent Company #2 DUNS:	

Facility Location Address

Street 1:	299 Extension Street
Street 2:	
City:	Verona
State:	MISSOURI
ZIP:	65769
ZIP4:	0085
County:	LAWRENCE

Facility Latitude and Longitude

Latitude (decimal):	36.962822
Longitude (decimal):	-93.798237
Lat/Long Method:	Interpolation - Photo
Lat/Long Description:	Plant Entrance (General)
Horizontal Accuracy Measure:	25
Horizontal Reference Datum Name:	North American Datum of 1983
Source Map Scale Number:	24000

Owner or Operator

Operator Name:	BCP Ingredients Incorporated
Operator Phone:	(417) 498-2241

Mailing Address

Operator Street 1:	299 Extension Street
Operator Street 2:	
Operator City:	Verona
Operator State:	MISSOURI
Operator ZIP:	65769
Operator ZIP4:	0085
Operator Foreign State or Province:	
Operator Foreign ZIP:	
Operator Foreign Country:	

Name and title of person or position responsible for Part 68 (RMP) Implementation

RMP Name of Person:	Jerome Freiburger
RMP Title of Person or Position:	Plant Manager
RMP E-mail Address:	jfreiburger@balchem.com

Emergency Contact

Emergency Contact Name:	Jerome Freiburger
Emergency Contact Title:	Plant Manager
Emergency Contact Phone:	(417) 498-2241
Emergency Contact 24-Hour Phone:	(417) 498-2241
Emergency Contact Ext. or PIN:	
Emergency Contact E-mail Address:	jfreiburger@balchemc.com

Other Points of Contact

Facility or Parent Company E-mail Address:	
Facility Public Contact Phone:	(417) 498-2241
Facility or Parent Company WWW Homepage Address:	www.balchem.com

Local Emergency Planning Committee

LEPC:	Lawrence County LEPC

Full Time Equivalent Employees

Number of Full Time Employees (FTE) on Site:	124
FTE Claimed as CBI:	

Covered By

OSHA PSM :	Yes
EPCRA 302 :	Yes
CAA Title V:	Yes

Air Operating Permit ID:	OP2019-025

OSHA Ranking

OSHA Star or Merit Ranking:	

Last Safety Inspection

Last Safety Inspection (By an External Agency) Date:	23-Jul-2020
Last Safety Inspection Performed By an External Agency:	State environmental agency

Predictive Filing

Did this RMP involve predictive filing?:	

Preparer Information

Preparer Name:	
Preparer Phone:	
Preparer Street 1:	
Preparer Street 2:	
Preparer City:	
Preparer State:	
Preparer ZIP:	
Preparer ZIP4:	
Preparer Foreign State:	
Preparer Foreign Country:	
Preparer Foreign ZIP:	

Confidential Business Information (CBI)

CBI Claimed:	
Substantiation Provided:	
Unsanitized RMP Provided:	

Reportable Accidents

Reportable Accidents:	See Section 6. Accident History below to determine if there were any accidents reported for this RMP.

Process Chemicals

Process ID:	1000114871
Description:	EO Building Drum Storage
Process Chemical ID:	1000143513
Program Level:	Program Level 3 process
Chemical Name:	Ethylene oxide [Oxirane]
CAS Number:	75-21-8
Quantity (lbs):	120000
CBI Claimed:	
Flammable/Toxic:	Toxic

Process ID:	1000114872
Description:	EO Drum Truck Storage
Process Chemical ID:	1000143514
Program Level:	Program Level 3 process
Chemical Name:	Ethylene oxide [Oxirane]
CAS Number:	75-21-8
Quantity (lbs):	120000
CBI Claimed:	
Flammable/Toxic:	Toxic

Process ID:	1000114873
Description:	Choline, Salts
Process Chemical ID:	1000143515
Program Level:	Program Level 3 process
Chemical Name:	Ethylene oxide [Oxirane]
CAS Number:	75-21-8
Quantity (lbs):	2200000
CBI Claimed:	
Flammable/Toxic:	Toxic

Process ID:	1000114873
Description:	Choline, Salts
Process Chemical ID:	1000143516
Program Level:	Program Level 3 process
Chemical Name:	Trimethylamine [Methanamine, N,N-dimethyl-]
CAS Number:	75-50-3
Quantity (lbs):	1400000
CBI Claimed:	
Flammable/Toxic:	Flammable

Process NAICS

Process ID:	1000114871
Process NAICS ID:	1000116264
Program Level:	Program Level 3 process
NAICS Code:	42469
NAICS Description:	Other Chemical and Allied Products Merchant Wholesalers

Process ID:	1000114872
Process NAICS ID:	1000116265
Program Level:	Program Level 3 process
NAICS Code:	42469
NAICS Description:	Other Chemical and Allied Products Merchant Wholesalers

Process ID:	1000114873
Process NAICS ID:	1000116266

Program Level:	Program Level 3 process
NAICS Code:	311999
NAICS Description:	All Other Miscellaneous Food Manufacturing

Section 2. Toxics: Worst Case

Toxic Worst ID: 1000092845

Percent Weight:	
Physical State:	Gas liquified by pressure
Model Used:	EPA's RMP*Comp(TM)
Release Duration (mins):	10
Wind Speed (m/sec):	1.5
Atmospheric Stability Class:	F
Topography:	Rural

Passive Mitigation Considered

Dikes:	
Enclosures:	
Berms:	
Drains:	
Sumps:	
Other Type:	

Section 3. Toxics: Alternative Release

Toxic Alter ID: 1000098677

Percent Weight:	
Physical State:	Gas liquified by pressure
Model Used:	EPA's RMP*Comp(TM)
Wind Speed (m/sec):	3.0
Atmospheric Stability Class:	D
Topography:	Rural

Passive Mitigation Considered

Dikes:	
Enclosures:	Yes
Berms:	
Drains:	
Sumps:	
Other Type:	

Active Mitigation Considered

Sprinkler System:	
Deluge System:	
Water Curtain:	
Neutralization:	
Excess Flow Valve:	
Flares:	
Scrubbers:	
Emergency Shutdown:	
Other Type:	Manual Emergency Shutdown System

Toxic Alter ID: 1000098678

Percent Weight:	
Physical State:	Gas liquified by pressure
Model Used:	EPA's RMP*Comp(TM)
Wind Speed (m/sec):	3.0
Atmospheric Stability Class:	D
Topography:	Rural

Passive Mitigation Considered

Dikes:	
Enclosures:	Yes
Berms:	
Drains:	
Sumps:	
Other Type:	

Active Mitigation Considered

Sprinkler System:	
Deluge System:	
Water Curtain:	
Neutralization:	
Excess Flow Valve:	
Flares:	
Scrubbers:	

Emergency Shutdown:
Other Type:

Toxic Alter ID: 1000098679

Percent Weight:	
Physical State:	Gas liquified by pressure
Model Used:	EPA's RMP*Comp(TM)
Wind Speed (m/sec):	3.0
Atmospheric Stability Class:	D
Topography:	Rural

Passive Mitigation Considered

Dikes:
Enclosures:
Berms:
Drains:
Sumps:
Other Type:

Active Mitigation Considered

Sprinkler System:
Deluge System:
Water Curtain:
Neutralization:
Excess Flow Valve:
Flares:
Scrubbers:
Emergency Shutdown:
Other Type: Manual Emergency Shutdown System

Section 4. Flammables: Worst Case

Flammable Worst ID: 1000069960

Model Used:	EPA's RMP*Comp(TM)
Endpoint used:	1 PSI

Passive Mitigation Considered

Blast Walls:	
Other Type:	

Section 5. Flammables: Alternative Release

Flammable Alter ID: 1000065456

Model Used:	EPA's RMP*Comp(TM)

Passive Mitigation Considered

Dikes:	
Fire Walls:	
Blast Walls:	
Enclosures:	
Other Type:	

Active Mitigation Considered

Sprinkler System:	
Deluge System:	
Water Curtain:	
Excess Flow Valve:	
Other Type:	Manual Emergency Shutdown System

Section 6. Accident History

No records found.

Section 7. Program Level 3

Description

This process includes drum storage inside the building. Once the drums are filled, they are staged in the storage area of the buliding until being loaded into a trailer, for further staging on the lot, or for delivery.

Program Level 3 Prevention Program Chemicals

Prevention Program Chemical ID:	1000122476
Chemical Name:	Ethylene oxide [Oxirane]
Flammable/Toxic:	Toxic
CAS Number:	75-21-8

Process ID:	1000114871
Description:	EO Building Drum Storage
Prevention Program Level 3 ID:	1000098237
NAICS Code:	42469

Safety Information

Safety Review Date (The date on which the safety information was last reviewed or revised):	22-May-2019

Process Hazard Analysis (PHA)

PHA Completion Date (Date of last PHA or PHA update):	22-May-2019

The Technique Used

What If:	Yes
Checklist:	
What If/Checklist:	
HAZOP:	
Failure Mode and Effects Analysis:	
Fault Tree Analysis:	
Other Technique Used:	
PHA Change Completion Date (The expected or actual date of completion of all changes resulting from last PHA or PHA update):	31-Dec-2019

Major Hazards Identified

Toxic Release:	Yes
Fire:	Yes
Explosion:	Yes
Runaway Reaction:	Yes
Polymerization:	Yes
Overpressurization:	Yes
Corrosion:	
Overfilling:	Yes
Contamination:	Yes
Equipment Failure:	Yes

Loss of Cooling, Heating, Electricity, Instrument Air:	
Earthquake:	
Floods (Flood Plain):	
Tornado:	
Hurricanes:	
Other Major Hazard Identified:	

Process Controls in Use

Vents:	Yes
Relief Valves:	Yes
Check Valves:	Yes
Scrubbers:	Yes
Flares:	
Manual Shutoffs:	Yes
Automatic Shutoffs:	Yes
Interlocks:	Yes
Alarms and Procedures:	Yes
Keyed Bypass:	
Emergency Air Supply:	
Emergency Power:	
Backup Pump:	
Grounding Equipment:	Yes
Inhibitor Addition:	
Rupture Disks:	Yes
Excess Flow Device:	Yes
Quench System:	Yes
Purge System:	Yes
None:	
Other Process Control in Use:	

Mitigation Systems in Use

Sprinkler System:	Yes
Dikes:	
Fire Walls:	
Blast Walls:	
Deluge System:	Yes
Water Curtain:	
Enclosure:	Yes
Neutralization:	
None:	
Other Mitigation System in Use:	

Monitoring/Detection Systems in Use

Process Area Detectors:	Yes
Perimeter Monitors:	
None:	
Other Monitoring/Detection System in Use:	

Changes Since Last PHA Update

Reduction in Chemical Inventory:	
Increase in Chemical Inventory:	

Change Process Parameters:	
Installation of Process Controls:	
Installation of Process Detection Systems:	
Installation of Perimeter Monitoring Systems:	
Installation of Mitigation Systems:	
None Recommended:	Yes
None:	
Other Changes Since Last PHA or PHA Update:	

Review of Operating Procedures

Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures):	15-Aug-2020

Training

Training Revision Date (The date of the most recent review or revision of training programs):	15-Aug-2020

The Type of Training Provided

Classroom:	Yes
On the Job:	Yes
Other Training:	

The Type of Competency Testing Used

Written Tests:	Yes
Oral Tests:	
Demonstration:	Yes
Observation:	Yes
Other Type of Competency Testing Used:	

Maintenance

Maintenance Procedures Revision Date (The date of the most recent review or revision of maintenance procedures):	15-Aug-2020
Equipment Inspection Date (The date of the most recent equipment inspection or test):	22-Jan-2021
Equipment Tested (Equipment most recently inspected or tested):	Valves

Management of Change

Change Management Date (The date of the most recent change that triggered management of change procedures):	24-Mar-2017
Change Management Revision Date (The date of the most recent review or revision of management of change procedures):	22-May-2020

Pre-Startup Review

Pre-Startup Review Date (The date of the most recent pre-startup review):	31-Mar-2017

Compliance Audits

Compliance Audit Date (The date of the most recent compliance audit):	10-Dec-2020
Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit):	29-Dec-2020

Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)):	15-Jul-2020
Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation):	15-Jul-2020

Employee Participation Plans

Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans):	15-Aug-2020

Hot Work Permit Procedures

Hot Work permit Review Date (The date of the most recent review or revision of hot work permit procedures):	15-Aug-2020

Contractor Safety Procedures

Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures):	15-Aug-2020
Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance):	14-Jul-2020

Confidential Business Information

CBI Claimed:

Description

This process includes drum storage inside truck trailers. The trailer is loaded with full drums of Ethylene Oxide and then is staged in open lot until it is sent for delivery.

Program Level 3 Prevention Program Chemicals

Prevention Program Chemical ID:	1000122477
Chemical Name:	Ethylene oxide [Oxirane]
Flammable/Toxic:	Toxic
CAS Number:	75-21-8
Process ID:	1000114872
Description:	EO Drum Truck Storage
Prevention Program Level 3 ID:	1000098238
NAICS Code:	42469

Safety Information

Safety Review Date (The date on which the safety information was last reviewed or revised):	22-May-2020

Process Hazard Analysis (PHA)

PHA Completion Date (Date of last PHA or PHA update):	22-May-2019

The Technique Used

What If:	Yes
Checklist:	
What If/Checklist:	
HAZOP:	
Failure Mode and Effects Analysis:	
Fault Tree Analysis:	
Other Technique Used:	
PHA Change Completion Date (The expected or actual date of completion of all changes resulting from last PHA or PHA update):	31-Dec-2019

Major Hazards Identified

Toxic Release:	Yes
Fire:	Yes
Explosion:	Yes
Runaway Reaction:	Yes
Polymerization:	Yes
Overpressurization:	Yes
Corrosion:	
Overfilling:	Yes
Contamination:	Yes
Equipment Failure:	Yes
Loss of Cooling, Heating, Electricity, Instrument Air:	

Earthquake:
Floods (Flood Plain):
Tornado:
Hurricanes:
Other Major Hazard Identified:

Process Controls in Use

Vents:
Relief Valves:
Check Valves:
Scrubbers:
Flares:
Manual Shutoffs:
Automatic Shutoffs:
Interlocks:
Alarms and Procedures:
Keyed Bypass:
Emergency Air Supply:
Emergency Power:
Backup Pump:
Grounding Equipment:
Inhibitor Addition:
Rupture Disks:
Excess Flow Device:
Quench System:
Purge System:
None:
Other Process Control in Use: Portable leak detection equipment

Mitigation Systems in Use

Sprinkler System:
Dikes:
Fire Walls:
Blast Walls:
Deluge System:
Water Curtain:
Enclosure: Yes
Neutralization:
None:
Other Mitigation System in Use:

Monitoring/Detection Systems in Use

Process Area Detectors:
Perimeter Monitors:
None:
Other Monitoring/Detection System in Use: Portable leak detection equipment

Changes Since Last PHA Update

Reduction in Chemical Inventory:
Increase in Chemical Inventory:
Change Process Parameters:

Installation of Process Controls:	
Installation of Process Detection Systems:	
Installation of Perimeter Monitoring Systems:	
Installation of Mitigation Systems:	
None Recommended:	Yes
None:	
Other Changes Since Last PHA or PHA Update:	

Review of Operating Procedures

Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures):	15-Aug-2020

Training

Training Revision Date (The date of the most recent review or revision of training programs):	15-Aug-2020

The Type of Training Provided

Classroom:	Yes
On the Job:	Yes
Other Training:	

The Type of Competency Testing Used

Written Tests:	Yes
Oral Tests:	
Demonstration:	Yes
Observation:	Yes
Other Type of Competency Testing Used:	

Maintenance

Maintenance Procedures Revision Date (The date of the most recent review or revision of maintenance procedures):	15-Aug-2020
Equipment Inspection Date (The date of the most recent equipment inspection or test):	22-Jan-2021
Equipment Tested (Equipment most recently inspected or tested):	Valves

Management of Change

Change Management Date (The date of the most recent change that triggered management of change procedures):	24-Mar-2017
Change Management Revision Date (The date of the most recent review or revision of management of change procedures):	22-May-2020

Pre-Startup Review

Pre-Startup Review Date (The date of the most recent pre-startup review):	31-Mar-2017

Compliance Audits

Compliance Audit Date (The date of the most recent compliance audit):	10-Dec-2020
Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit):	29-Dec-2020

Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)):	15-Jul-2020
Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation):	15-Jul-2020

Employee Participation Plans

Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans):	22-May-2020

Hot Work Permit Procedures

Hot Work permit Review Date (The date of the most recent review or revision of hot work permit procedures):	22-May-2020

Contractor Safety Procedures

Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures):	22-May-2020
Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance):	14-Jul-2020

Confidential Business Information

CBI Claimed:	

Description

This process includes two interconnected production units, Aqueous Choline and Choline Salts. All information included in this prevention program applies to both units with the following exceptions: - Only Aqueous Choline operates with all valves opened. The valves will close automatically due to loss of system pressure under the following conditions; loss of nitrogen supply, rupture of nitrogen tubing due to mechanical failure, a fire at the unloading pump causing the plastic tubing to melt, resulting in sealing the vessel, power failure, switch being manually turned, high storage tank temperature, and high rate of rise in storage tank level. Vessels are equipped with relief valves and high level indicators. The Aqueous Choline system is equipped with a camera monitoring device as an additional safeguard in detecting any deficiencies in the safe operation of the process and to lessen the risk of any accidental releases.

Program Level 3 Prevention Program Chemicals

Prevention Program Chemical ID:	1000122478
Chemical Name:	Ethylene oxide [Oxirane]
Flammable/Toxic:	Toxic
CAS Number:	75-21-8

Process ID:	1000114873
Description:	Choline, Salts
Prevention Program Level 3 ID:	1000098239
NAICS Code:	311999

Prevention Program Chemical ID:	1000122479
Chemical Name:	Trimethylamine [Methanamine, N,N-dimethyl-]
Flammable/Toxic:	Flammable
CAS Number:	75-50-3

Process ID:	1000114873
Description:	Choline, Salts
Prevention Program Level 3 ID:	1000098239
NAICS Code:	311999

Safety Information

Safety Review Date (The date on which the safety information was last reviewed or revised):	20-Sep-2019

Process Hazard Analysis (PHA)

PHA Completion Date (Date of last PHA or PHA update):	20-Sep-2019

The Technique Used

What If:	Yes
Checklist:	
What If/Checklist:	
HAZOP:	
Failure Mode and Effects Analysis:	
Fault Tree Analysis:	

Other Technique Used:	
PHA Change Completion Date (The expected or actual date of completion of all changes resulting from last PHA or PHA update):	31-Dec-2019

Major Hazards Identified

Toxic Release:	Yes
Fire:	Yes
Explosion:	Yes
Runaway Reaction:	Yes
Polymerization:	
Overpressurization:	Yes
Corrosion:	
Overfilling:	Yes
Contamination:	
Equipment Failure:	
Loss of Cooling, Heating, Electricity, Instrument Air:	
Earthquake:	
Floods (Flood Plain):	
Tornado:	
Hurricanes:	
Other Major Hazard Identified:	

Process Controls in Use

Vents:	Yes
Relief Valves:	Yes
Check Valves:	Yes
Scrubbers:	Yes
Flares:	
Manual Shutoffs:	Yes
Automatic Shutoffs:	Yes
Interlocks:	Yes
Alarms and Procedures:	Yes
Keyed Bypass:	
Emergency Air Supply:	
Emergency Power:	
Backup Pump:	
Grounding Equipment:	Yes
Inhibitor Addition:	
Rupture Disks:	Yes
Excess Flow Device:	Yes
Quench System:	Yes
Purge System:	Yes
None:	
Other Process Control in Use:	

Mitigation Systems in Use

Sprinkler System:	Yes
Dikes:	
Fire Walls:	
Blast Walls:	
Deluge System:	Yes
Water Curtain:	

Enclosure:	Yes
Neutralization:	
None:	
Other Mitigation System in Use:	Water cannons

Monitoring/Detection Systems in Use

Process Area Detectors:	Yes
Perimeter Monitors:	
None:	
Other Monitoring/Detection System in Use:	Video camera monitoring

Changes Since Last PHA Update

Reduction in Chemical Inventory:	
Increase in Chemical Inventory:	
Change Process Parameters:	Yes
Installation of Process Controls:	
Installation of Process Detection Systems:	
Installation of Perimeter Monitoring Systems:	
Installation of Mitigation Systems:	
None Recommended:	
None:	
Other Changes Since Last PHA or PHA Update:	

Review of Operating Procedures

Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures):	31-Dec-2019

Training

Training Revision Date (The date of the most recent review or revision of training programs):	31-Dec-2019

The Type of Training Provided

Classroom:	Yes
On the Job:	Yes
Other Training:	

The Type of Competency Testing Used

Written Tests:	Yes
Oral Tests:	
Demonstration:	Yes
Observation:	Yes
Other Type of Competency Testing Used:	

Maintenance

Maintenance Procedures Revision Date (The date of the most recent review or revision of maintenance procedures):	12-Nov-2018

Equipment Inspection Date (The date of the most recent equipment inspection or test):	05-Feb-2021
Equipment Tested (Equipment most recently inspected or tested):	Scale 14 in V10

Management of Change

Change Management Date (The date of the most recent change that triggered management of change procedures):	24-May-2019
Change Management Revision Date (The date of the most recent review or revision of management of change procedures):	22-May-2019

Pre-Startup Review

Pre-Startup Review Date (The date of the most recent pre-startup review):	01-Oct-2020

Compliance Audits

Compliance Audit Date (The date of the most recent compliance audit):	03-Feb-2021
Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit):	03-Feb-2021

Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)):	15-Feb-2021
Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation):	21-Feb-2021

Employee Participation Plans

Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans):	15-Feb-2018

Hot Work Permit Procedures

Hot Work permit Review Date (The date of the most recent review or revision of hot work permit procedures):	15-Aug-2018

Contractor Safety Procedures

Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures):	15-Dec-2019

Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance):	14-Jul-2020

Confidential Business Information

CBI Claimed:

Section 8. Program Level 2

No records found.

Section 9. Emergency Response

Written Emergency Response (ER) Plan

Community Plan (Is facility included in written community emergency response plan?):	Yes
Facility Plan (Does facility have its own written emergency response plan?):	
Response Actions (Does ER plan include specific actions to be taken in response to accidental releases of regulated substance(s)?):	
Public Information (Does ER plan include procedures for informing the public and local agencies responding to accidental release?):	
Healthcare (Does facility's ER plan include information on emergency health care?):	

Emergency Response Review

Review Date (Date of most recent review or update of facility's ER plan):	

Emergency Response Training

Training Date (Date of most recent review or update of facility's employees):	

Local Agency

Agency Name (Name of local agency with which the facility ER plan or response activities are coordinated):	Aurora Rural Fire Department
Agency Phone Number (Phone number of local agency with which the facility ER plan or response activities are coordinated):	(417) 678-5400

Subject to

OSHA Regulations at 29 CFR 1910.38:	Yes
OSHA Regulations at 29 CFR 1910.120:	
Clean Water Regulations at 40 CFR 112:	Yes
RCRA Regulations at CFR 264, 265, and 279.52:	Yes
OPA 90 Regulations at 40 CFR 112, 33 CFR 154, 49 CFR 194, or 30 CFR 254:	
State EPCRA Rules or Laws:	Yes
Other (Specify):	

Executive Summary

BCP Ingredients Inc. manufacturing facility handles ethylene oxide and trimethylamine, both of which are listed as a regulated substance under 40 CFR Part 68. Both are present in quantities that exceed the threshold quantity for applicability of EPA's Accidental Release Program. Ethylene oxide (a toxic chemical), and trimethylamine (a flammable chemical) are utilized at this facility for the manufacture of nutritional supplements, animal food products for the poultry, beef, dairy, and companion animal industry, and also in the oil well production industry. Ethylene oxide is also repackaged for use in the sterilization of medical implements and spices. BCP Ingredients commitment to providing a safe and healthy work environment for employees, as well as providing a safe and healthy environment for the surrounding community is supported by the incorporation of the latest technology in process controls, active mitigation, passive mitigation, and monitoring and detection systems. BCP Ingredients adheres to all applicable Federal, State, and local safety and environmental regulations for the prevention of releases of these and all chemicals. All information regarding BCP Ingredients Risk Management Plan has been submitted to EPA utilizing EPA's RMP eSubmit Software.

Accidental Release Prevention Program:

BCP Ingredients complies with the Process Safety Management Rule of OSHA standard 29 CFR 1910.119 for the prevention of hazardous chemical releases, and is therefore subject to the requirements of EPA's Program 3 instead of Program 2. It should be noted that no data is reported for Program 2 in the RMP eSubmit data because BCP Ingredients is subject only to Program 3. Program 3 (which is OSHA's Process Safety Management Plan) is a comprehensive program with fourteen elements, including process hazard analysis, employee training, operating procedures, mechanical integrity, pre-safety startup, contractor safety, emergency planning and response, compliance auditing, and employ participation. The Process Safety Management Program ensures that the processes and the equipment in the processes are designed, constructed, and maintained according to industry codes and standards, and that the processes follow good engineering practices. The mechanical integrity element of the program includes continuous inspections and testing of equipment and monitoring devices in the processes to detect any deficiencies and correct them before it contributes to a potential release incident. All elements of the Process Safety Management Program help to ensure that an uncontrolled release of ethylene oxide or trimethylamine is prevented.

Five Year Accident History:

BCP Ingredients has not had an accident that meets the regulation criteria in more than five years.

Emergency Response Plan:

BCP Ingredients has developed an emergency action plan in accordance with 29 CFR 1910.38 that includes provisions to evacuate employees from the facility in the event of an uncontrolled accidental release of a hazardous chemical. It is BCP Ingredients policy to contact 911 (which is dispatched through the Monett, MO police department).The local emergency planning committee and the local fire departments will be contacted by them in the event of a hazardous chemical release. BCP Ingredients has contracted an emergency response group (Environmental Management Inc.) that will respond to any hazardous chemical release requiring any cleanup operation. BCP Ingredients has coordinated with the local emergency planning committee on it's emergency action plan, and in the unlikely event of an uncontrolled release, they will notify any affected neighbors or surrounding properties if an evacuation is necessary.

Commitment to Safety:

BCP Ingredients consistently maintain a recordable injury rate below industry averages. We strive to continuously improve the safe operation of the ethylene oxide and trimethylamine processes by implementing preventative maintenance programs, inspection programs, and employee training in the safe operation of these systems. All regulated processes are designed in accordance with good engineering practices. Periodic auditing of the Process Safety Management Program ensures that any system changes or modifications are evaluated and the necessary safety precautions and/or safety improvements are made before the process is placed into operation.